

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	
	:	Chapter 11 Case No.
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)

**STIPULATION AND AGREED ORDER REGARDING SCHEDULING ISSUES IN
MATTER BEING TRANSFERRED TO THIS COURT INVOLVING GENERAL
MOTORS LLC, FAMILY AUTO, INC. AND THYS CHEVROLET, INC.**

General Motors LLC (“**New GM**”), Family Auto, Inc. and Thys Chevrolet Inc.
(collectively, Family Auto, Inc. and Thys Chevrolet, Inc. “**Plaintiffs**”), by and through their
respective undersigned attorneys, enter into this Stipulation and Agreed Order and state:

WHEREAS, on October 13, 2010, the United States District Court for the
Northern District of Iowa transferred this matter to the United States District Court for the
Southern District of New York ("Southern District of New York") for referral to this Court (see
Order, Thys Chevrolet, Inc. v. General Motors LLC, Case No. 1:10-cv-00046-LRR (N.D. Iowa
Oct. 12, 2010) (Doc. No. 36); see also Doc. No. 37);

WHEREAS, on October 19, 2010, the Southern District of New York entered an
Order directing the clerk to transfer this matter to this Court (see Order, Thys Chevrolet, Inc. v.
General Motors LLC, No. 1:10-cv-07799-PAC (S.D.N.Y. Oct. 10, 2010) (Doc. No. 38); see also
Doc. Entry dated Oct. 25, 2010); and

WHEREAS, the parties have met and conferred regarding the matters identified in
this Stipulation and Agreed Order.

NOW, THEREFORE, it is hereby stipulated and agreed by and between Plaintiffs
and New GM, through their undersigned counsel, that, in light of the course of the prior

proceedings and the recent procedural developments described above, the parties have met and conferred regarding preliminary scheduling issues in this case and have agreed as follows:

(1) That New GM may move, plead, or respond to Plaintiffs' Complaint and/or file counterclaims on or before November 9, 2010, and

(2) That the parties shall serve their written discovery responses and/or objections to previously served discovery by November 12, 2010.

IT IS SO ORDERED

October 27, 2010

New York, New York

s/ Robert E. Gerber

United States Bankruptcy Judge

By s/ James H. Arenson

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